

## Department of Environmental Quality

L. Scott Baird
Interim Executive Director

DIVISION OF AIR QUALITY Bryce C. Bird Director

DAQ-089-19

## MEMORANDUM

**TO:** Air Quality Board

**THROUGH:** Bryce C. Bird, Executive Secretary

**FROM:** Becky Close, Environmental Scientist

**DATE:** August 22, 2019

**SUBJECT:** PROPOSE FOR PUBLIC COMMENT: SIP Subsection IX.A.36: PM2.5 Maintenance

Provisions for Salt Lake City, UT.

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On January 2, 2019, the Utah Air Quality Board approved Utah State Implementation Plan (SIP) Subsection IX.A.31: *Control Measures for Area and Point Sources, Fine Particulate Matter, Serious Area PM*<sub>2.5</sub> *for the Salt Lake City, UT Nonattainment Area* (Serious SIP). The Serious SIP includes all necessary elements to support the demonstration, control strategy, and implementation of the attainment plan. The Serious SIP was submitted to the Environmental Protection Agency (EPA) on February 15, 2019.

Under the EPA's Clean Data Policy, EPA proposed a clean data determination for the Salt Lake City Nonattainment Area (SLC NAA) on June 5, 2019. The clean data determination shows that the SLC NAA attained the 2006 24-hr  $PM_{2.5}$  national ambient air quality standard (NAAQS) based on validated monitored data from 2016 to 2018, prior to the attainment deadline of December 31, 2019. Final EPA approval of the clean data determination is expected by the time this SIP subsection is proposed for final adoption by the Board.

A finding that the area has attained the standard does not mean the area is automatically reclassified to attainment status. For that to happen, EPA must take action to redesignate an area from nonattainment back to attainment. The Clean Air Act (CAA) outlines five requirements that a nonattainment area must satisfy for redesignation to occur, and this proposed SIP addresses those requirements:

- 1. Attainment of the NAAOS
- 2. A fully approved Attainment SIP
- 3. A demonstration that improvements in air quality are due to permanent and enforceable emissions reductions

- 4. A demonstration that the State has met requirements applicable to the area under CAA Section 110 and Part D
- 5. A fully approved maintenance plan

Requirements 1 through 4 are addressed in the first section of this SIP as part of the documentation for the redesignation request. The maintenance plan is also included in this SIP package and includes a modeling demonstration that the SLC NAA continues to attain the NAAQS out to 2035, with an intermediate year check in of 2026. As noted in EPA guidance, the EPA approval action on SIP elements and the redesignation request may occur simultaneously. Therefore, some serious SIP elements may still be pending approval and will likely be approved by EPA concurrently with the redesignation to attainment status.

<u>Recommendation</u>: Staff recommends that the Board propose SIP Subsection IX.A.36: PM<sub>2.5</sub> Maintenance Provisions for Salt Lake City, UT, for a 30-day public comment period.